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2. 2 ZU

General Telecommunications Market Conditions in Arizona

3 51 [1 197 1) Status of state commission proceedings to implement the local competition provisions of the telecommunications Act of 1996 (1996 Act").

Response: In addition to the proceedings listed in U S WEST's response to the question, contained in Attachments A & B to its March 25,1999, Supplemental Notice of Intent to File with FCC and Application for Verification of §271(c) Compliance (hereafter "USW Response"), Sprint is aware of U S West's recent filing of a new complaint in the Arizona United States District Court. That March 26th filing purports to appeal the provisions of the U S WEST/Sprint interconnection agreement requiring combination of network elements by U S WEST.

- 2) Identity of the entities that have been certified by the state to provide:
 - facilities based local exchange service. a)
 - b) resold local exchange service,
 - exchange access service. c)

Response: Sprint Communications Company L.P. was certificated by this Commission to provide local exchange services and exchange access services by Decision 60236, in Docket No. U-2432-96-501, on June 12, 1997. The authorization for provision of local exchange services was on both a resell and facilities basis.

3) Whether the entities in 2 are providing business exchange service, residential exchange service, business exchange access service, or residential exchange access service (identifying special or switched access). If the competitor is not providing any of these services, does it plan to. When?

Response: Sprint has not yet commenced the provision of such services in Arizona but has recently submitted a tariff for the provision of local exchange services to business customers on a resold basis that is proposed to be effective April 15, 1999. Attachment 2 of USW's Response is erroneous in listing Sprint as "actually purchasing resale services." Sprint anticipates offering local exchange services and exchange access on a facilities basis sometime within the next eighteen months and plans to eventually offer services to residential customers. Specific timetables are proprietary and subject to change.

4) The identity of the entities that have requested:

- a) interconnection from U S West,
- b) unbundled elements from U S West.
- c) the ability to resell U S West's services.

The date the requests were made and the extent to which U S West and the requesting entity have entered into binding agreements, as well as copies of any such agreements

Response: The U S West / Sprint interconnection agreement provides for interconnection, provision of unbundled elements and resale of U S West services. It was submitted to, and approved by, the Commission, but another copy will be provided upon request. The agreement expires on December 15, 1999, but provides for continuation until a new agreement becomes effective. The agreement also provides for commencement of negotiations on a new agreement no later than six months before the termination of the current agreement.

- 5) a) The number of access lines in Arizona that are served by U S West's competitors.
 - b) The number and location of U S West's switches that are connected to loops served by competitors.
 - c) The scope of the geographic areas for which the competitors' services are available.
 - d) The number and types of customers for which the competitors' services are available.
 - e) The extent to which each competitor is using its own facilities to provide service or is using unbundled or resold services obtained from U S West
 - f) A description of the competitors' facilities in operation in U S West's service area.
 - g) Whether the competitor is currently expanding its facilities and when the expansion is expected to be completed.
 - h) The average provisioning intervals and maintenance times for services U S West provides to competitors compared to those it provides to itself.

Response: See response to Question 3.

- 6) a) The number of access lines U S West serves in Arizona.
 - b) The number, type, and location of U S West's switches in Arizona.
 - c) The number and types of customers for which U S West's services are available.
 - d) The amount of revenues that U S West derived from Arizona in the most recent year, broken down by basic residential service, basic

business service, intraLATA toll, access charges, and other services.

Response: Not applicable to Sprint.

7) Any reports, studies, or analyses available, and created within the past year, that contain data on market shares of U S West and local telephone service competitors or compare volumes of traffic, revenues, or facilities of the BOC and local competitors. Also, any evaluation of the likely entry, success or rate of growth of competitors or potential competitors. Proprietary information provided pursuant to this paragraph will be available pursuant to Protective Agreement, and will be disclosed only to the Commission, unless the parties can demonstrate compelling need for disclosure of information. Parties that file information designated as proprietary information are required to file a notice that generally describes what information is considered proprietary.

Response: Sprint does not have any such reports, studies or analyses for Arizona.

8) A description of all complaints involving Arizona made to U S West, to the Arizona Corporation Commission, to the FCC, or other governmental authorities by other entities that have requested and/or received interconnection.

Response: Sprint filed a complaint against USW on December 18, 1998, (not July 21, 1998, as stated in USW's Response) concerning USW's failure to provide documentation concerning the availability of space for physical collocation in its McClintoch wire center in Tempe, Arizona.

9) Information demonstrating that authorization of U S West to provide interLATA service will be carried out in accordance with the requirements of Section 272 as required by Section 271(d)(3)(B).

Response: Sprint does not have such information.

All evidence supporting U S West's assertion that U S West's provision of interLATA service will be in the public interest as required under Section 271(d)(3)(C).

Response: Sprint does not have such evidence.

Attachment B

Information Directly Relevant to the Competitive Checklist

- 1) Interconnection in accordance with the requirements of sections 251(c)(2) and 252(d)(1).
 - a) What points are available for interconnection with U S West?
 - b) Do these points include physical collocation, virtual collocation or another form of collocation?
 - c) What is the pricing methodology used for interconnection?
 - d) What competitors have interconnected with U S West?
 - e) At what U S West switching equipment (central office, end office, tandem. etc.) have competitors interconnected and by what means for each office?

Response: Sprint has not commenced service and does not have any detailed independent knowledge regarding the availability of interconnection with U S West, aside from having requested physical collocation at certain U S West central offices.

- 2) Nondiscriminatory access to network elements in accordance with the requirements of sections 251(c)(3) and 252(d)(1).
 - a) What network elements are offered by U S West?
 - b) What is the pricing methodology used for the elements?
 - c) What elements have been requested by entities seeking interconnection and access?
 - d) What is the record concerning U S West's responsiveness to such requests?
 - e) What elements have actually been sold to entities seeking interconnection and access?
 - f) What entities have requested elements?
 - g) What entities have actually purchased the elements?
 - h) What entities are actually providing service utilizing, in part, elements purchased from U S West?

Response: Sprint has not commenced service and does not have any detailed independent knowledge regarding access to U S West network elements since it has not yet made requests for access.

3) Nondiscriminatory access to the poles. ducts, conduits, and rights-of-way owned or controlled by the Bell operating company at just and reasonable rates in accordance with the requirements of section 224.

- a) Do U S West and other providers have the same access to poles, ducts, and rights-of-way?
- b) What price does U S West charge and what is the pricing methodology for access to poles, ducts, and rights-of-way?
- c) Concerning operation in Arizona, does U S West believe that they have a different legal status concerning access to rights of way than a competitive provider? If so, what is the justification for any such difference?

Response: Sprint has not commenced service and does not have any detailed independent knowledge regarding access to these services or elements since it has not made requests for such access.

- 4) Local loop transmission from the central office to the customer's premises. unbundled from local switching or other services
 - a) What network elements are offered by U S West?
 - b) What is the pricing methodology used for the elements?
 - c) What elements have been requested by entities seeking interconnection and access?
 - d) What is the record concerning U S West's responsiveness to such requests?
 - e) What elements have actually been sold to entities seeking interconnection and access?
 - f) What entities have requested elements?
 - g) What entities have actually purchased the elements?
 - h) What entities are actually providing service utilizing, in part, elements purchased from U S West?

Response: Sprint has not commenced service and does not have any detailed independent knowledge regarding access to these services or elements since it has not made requests for such access.

- 5) Local transport from the trunk side of a wireline local exchange carrier switch unbundled from switching or other services.
 - a) What network elements are offered by U S West?
 - b) What is the pricing methodology used for the elements?
 - c) What elements have been requested by entities seeking interconnection and access?
 - d) What is the record concerning U S West's responsiveness to such requests?
 - e) What elements have actually been sold to entities seeking interconnection and access?
 - f) What entities have requested elements?
 - g) What entities have actually purchased the elements?

h) What entities are actually providing service utilizing in part. Elements purchased from U S West?

Response: Sprint has not commenced service and does not have any detailed independent knowledge regarding access to these services or elements since it has not made requests for such access.

- 6) Local switching unbundled from transport, local loop transmission, or other services.
 - a) What network elements are offered by U S West?
 - b) What is the pricing methodology used for the elements?
 - c) What elements have been requested by entities seeking interconnection and access?
 - d) What is the record concerning U S West's responsiveness to such requests?
 - e) What elements have actually been sold to entities seeking interconnection and access?
 - f) What entities have requested elements?
 - g) What entities have actually purchased the elements?
 - h) What entities are actually providing service utilizing in part elements purchased from U S West?

Response: Sprint has not commenced service and does not have any detailed independent knowledge regarding access to these services or elements since it has not made requests for such access.

- 7) Nondiscriminatory access to, 911 and E91 1 services, directory assistance services to allow the other carrier's customers to obtain telephone numbers, and operator call completion services.
 - (I) 911 and E911 services.
 - a) Does U S West offer 911 or E911 services to new customers/providers?
 - b) What entities have requested to purchase 911 and/or E911 services from U S West?
 - c) What entities have purchased 911 and/or E911 services from U S West?
 - d) What are the prices and pricing methodology for 911 and E911 services?
 - (II) Directory assistance services.
 - a) What entities have requested to purchase directory assistance services from U S West?
 - b) What entities have purchased directory assistance services from U S West?

- c) What are the prices and pricing methodology for directory assistance services?
- (III) Operator Services.
 - a) What entities have requested to purchase operator call completion services from U S West?
 - b) What entities have purchased operator call completion services from U S West?
 - c) What are the prices and pricing methodology for operator call completion services?

Response: Sprint has not commenced service and does not have any detailed independent knowledge regarding access to these services or elements since it has not made requests for such access. U S West's response is in error in listing Sprint as having acquired 911, Directory Assistance and operator services as part of resell of U S West services.

- 8) White pages directory listings for customers of the other carrier's telephone exchange service.
 - a) What entities have requested to include their customers in the listings of U S West?
 - b) What entities have their customers included in the listings of U S West?
 - c) What entities have chosen not to utilize inclusion of their customers in U S West's white pages listings?

Response: Sprint has not commenced service and does not have any detailed independent knowledge regarding access to these services or elements since it has not made requests for such access.

- 9) Until the date by which telecommunications numbering administration guidelines, plan, or rules are established, nondiscriminatory access to telephone numbers for assignment to the other carrier's telephone exchange service customers. After that date, compliance with such guidelines, plan, or rules.
 - a) Who is the number administrator for Arizona?
 - b) If U S West is the number administrator for Arizona, is there a date certain by which it will no longer perform that function?

Response: Not applicable.

10) Nondiscriminatory access to databases and associated signaling necessary for call routing and completion.

- a) What entities have requested to purchase such database and signaling services from U S West?
- b) What entities have purchased such database and signaling services from US West?
- c) What are the prices and pricing methodology for such database and signaling services?

Response: Sprint has not commenced service and does not have any detailed independent knowledge regarding access to these services or elements since it has not made requests for such access.

- 11) Until the date by which the Commission issues regulations pursuant to section 251 to require number portability, interim telecommunications number portability through remote call forwarding, direct inward dialing trunks, or other comparable arrangements. with as little impairment of functioning, quality, reliability, and convenience as possible. After that date, full compliance with such regulations
 - a) Is number portability being provided on an interim or full compliance basis?
 - b) If it is on an interim basis, what are the characteristics of the interim system and when will full number portability be implemented?
 - c) Is U S West providing carrier, geographic, or service number portability or any combination of the three?
 - d) What is the pricing methodology used to determine charges for number portability?

Response: Sprint has not commenced service and does not have any detailed independent knowledge regarding access to these services or elements since it has not made requests for such access.

- 12) Nondiscriminatory access to such services or information as are necessary to allow the requesting carrier to implement local dialing parity in accordance with the requirements of section 251 (b)(3).
 - a) Is U S West providing dialing parity for both local and intraLATA toll service?
 - b) If not, is U S West capable of providing such parity and will it provide it prior to the time when it offers interLATA service or at the time that it offers interLATA service?
 - c) Does U S West have any ACC, state court, federal court, FCC, or legislative action pending related to the provision of intraLATA and local dialing parity?

d) To what percentage of its customers will U S West provide intraLATA dialing parity, to prior to being released from its in-region interLATA restrictions?

Response: Sprint has not commenced service and does not have any detailed independent knowledge regarding access to these services or elements since it has not made requests for such access. Sprint is aware of U S West's implementation of intraLATA dialing parity in 1996.

- 13) Reciprocal compensation arrangements in accordance with the requirements of section 252(d)(2).
 - a) What reciprocal compensation arrangements does U S West have in Arizona with competing carriers?
 - b) What reciprocal compensation arrangements does U S West have in Arizona with other incumbent carriers?
 - c) Where interconnection is in place, how does traffic terminated on other networks (competitors and other incumbents) compare with traffic terminated on U S West's network? This can be expressed as percentages, number of specific calls, minutes of use, or other measure.

Response: Sprint has not yet commenced service and does not have any detailed independent knowledge regarding U S West's reciprocal compensation arrangements.

- 14) Telecommunications services are available for resale in accordance with the requirements of sections 251(c)(4) and 252(d)(3).
 - a) Have all of the services offered by U S West been made available for resale on the same terms previously offered?
 - b) If not, which services have been withdrawn or changed in terms with respect to resale?
 - c) What are the percentage discounts offered for resold services?i) The specific tariffed resale rates.
 - ii) Negotiated rates by specific contract.
 - d) What, if any, limitations does U S West impose on the resale of its
 - e) Are there currently any formal disputes related to the pricing of services for resale?
 - f) Are there currently any formal disputes related to the services or the definition of services for resale?
 - g) Have any entities requested to purchase services from U S West at specific tariffed rates (not including negotiated agreements)?
 - h) Are any entities currently purchasing services from U S West at specific tariffed rates (not including negotiated agreements)?

- i) Are any negotiations pending for the purchase of services for resale?
- j) Are any entities currently purchasing services from U S West pursuant to a negotiated agreement?
- k) How much revenue does the resale of services generate for U S West?

Response: Sprint has not commenced service and does not have any detailed independent knowledge regarding U S West's offering of services for resell beyond what is stated in U S West's response. However, Sprint believes that U S West has not made xDSL services available for resale.